IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE: § Chapter 13

JUAN CARLOS VILLARREAL § Case No. 21-30941 - hcm

§ § §

Debtor's §

TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

To the Honorable H. Christopher Mott, United States Bankruptcy Judge:

STUART C. COX, Standing Chapter 13 Trustee ("Trustee"), objects to Confirmation of the current Chapter 13 Plan filed by Debtor and as grounds would show the Court:

1. Trustee objects to confirmation of Debtor's Chapter 13 Plan insofar as Debtor's plan will not close or complete on the designated month and year. Trustee requests that said plan be amended to cure the plan term issue such that the plan completes and closes timely.

Relief Sought

Trustee prays for an Order Denying Confirmation of the proposed Chapter 13 Plan without prejudice to amend within fourteen (14) days of hearing, or in the alternative, that the instant case be dismissed, and that the Court grant the Chapter 13 Trustee such other, additional and further relief to which he may be justly entitled.

Respectfully submitted,

/s/Stuart C. Cox Stuart C. Cox Standing Chapter 13 Trustee SBN: 00794992 1760 N. Lee Trevino Dr. El Paso, TX 79936 (915) 598-6769 telephone (915) 598-9002 facsimile

CERTIFICATE OF SERVICE

This certifies that a copy of this document was served upon the parties listed below by United States Mail, first class, postage prepaid on January 26, 2022.

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> /s/Stuart C. Cox Stuart C. Cox